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August 3, 2020

Hon. Alison J. Nathan United States District Judge United States District Court Southern District of New York 40 Foley Square New York, New York 10007

Re: Rene Tellier v. United States, 19-cv-11262 (AJN), 92-cr-869 (AJN

Dear Judge Nathan:

On December 9, 2019, Rene Tellier filed a pro se petition pursuant to 28 U.S.C. § 2255. On June 9, 2020, Mr. Tellier amended that petition, and on June 25, 2020, the Court appointed me from the CJA panel to represent Mr. Tellier for purposes of his §2244 petition. The Court also issued a briefing schedule for additional submissions. I write now, with the consent of the government to seek an extension for the filing of the memorandum of law I intend to submit in support of Mr. Tellier's petition.

This case dates from 1992. I do not yet have access to the paper file and the government, too, is experiencing delays in accessing its file for Mr. Tellier. Neither the government nor I is yet in possession of his PSR, and the sentencing transcript that does exist is not complete or accurate, and is designed for "informational purposes" only. Furthermore, I have not yet been able to obtain Mr. Tellier's previous §2255 petitions. I intend to devote the next two to three weeks to retrieving all the necessary paperwork I need for my memorandum, and I therefore respectfully request an extension of 30 days for the filing of my brief – with similar extensions for the government's response and any reply.

SO ORDERED.

Thank you for your consideration.

Respectfully submitted,

/s/

Alison J. Nathan, U.S.D.J.

SO ORDERED. 8/5/20

Florian Miedel
Attorney for Rene Tellier

cc: AUSA Thomas Burnett